

Catherine Amirfar  
Ashika Singh  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, NY 10022  
Tel: 212-909-6000  
[camirfar@debevoise.com](mailto:camirfar@debevoise.com)  
*Counsel for Plaintiff Open Society Justice Initiative*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

OPEN SOCIETY JUSTICE INITIATIVE,  
Plaintiff,

v.

OFFICE OF THE DIRECTOR OF  
NATIONAL INTELLIGENCE,  
Defendant.

20 Civ. 06625 (PAE)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Cross-Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment, the Declaration of Ashika Singh, and all exhibits and attachments thereto, the undersigned, attorneys for the Open Society Justice Initiative ("OSJI") hereby move this Court for an order pursuant to Federal Rule of Civil Procedure 56 granting Plaintiff OSJI summary judgment against Defendant Office of the Director of National Intelligence ("ODNI") and denying Defendant's motion for summary judgment and for such other and further relief as the Court deems just and proper. The reasons supporting this motion are set forth in the concurrently filed memorandum.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's current scheduling Order of December 3, 2020 (Doc. No. 20), opposition papers, if any, must be served upon counsel of record no later than February 3, 2021.

Dated: January 13, 2021  
New York, NY

Respectfully submitted,

/s/ Catherine Amirfar  
Catherine Amirfar  
Ashika Singh  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
Tel.: (212) 909-6000  
camirfar@debevoise.com  
asingh@debevoise.com

Amrit Singh  
James A. Goldston  
OPEN SOCIETY JUSTICE  
INITIATIVE  
224 West 57th Street  
New York, New York 10019  
Tel: (212) 548-0600  
amrit.singh@opensocietyfoundations.  
org  
*Counsel for Plaintiff*

To: Natasha Teleanu, AUSA  
Peter Aronoff, AUSA  
*Counsel for defendants (by ECF)*